

IN THE DISTRICT COURT OF LINCOLN COUNTY  
STATE OF OKLAHOMA

CRYSTAL DAWN ALBARRAN-GIRON )

Child A, a minor child, )  
Through mother and guardian ad litem, )  
Crystal Dawn Albarran-Giron )

Child B, a minor child, )  
Through mother and Guardian Ad Litem, )  
Crystal Dawn Albarran-Giron )

Child C, a minor child, by )  
Mother and Guardian Ad Litem, Crystal )  
Dawn Albarran-Giron )

JUAN ALBARRAN-GIRON, deceased, )  
Through surviving widow, Crystal Dawn )  
Albarran-Giron )

Plaintiffs, )

v. )

Case No.: CJ-09-37

RONALD HARPER, )

RICHARD LEE ALDRICH, )

CON-WAY TRUCKLOAD, INC., dba )  
CON-WAY TRUCKLOAD, )

CON-WAY INC., )

ACE AMERICAN INSURANCE CO., )

ACE LIMITED. )

Defendants. )

**DEFENDANTS CON-WAY TRUCKLOAD, INC. AND CON-WAY, INC.'S NOTICE OF  
REMOVAL OF ACTION TO FEDERAL COURT**

EXHIBIT  
"15"

Pursuant to Title 28 of the United States Code, Section 1446(d), Defendants, Con-way Truckload, Inc. and Con-way, Inc., (collectively "Con-way") hereby give notice of the filing of Notice of Removal, removing this action from this Court to the United States District Court for the Western District of Oklahoma. A copy of Con-way's Notice of Removal, filed this day in federal court, is attached hereto as Exhibit "A."

No further action need be taken by this Court, other than forwarding a complete copy of the record of this action to the United States District Court, unless and until this action is remanded to this Court. See 28 U.S.C. § 1446(d).

Dated this \_\_\_\_\_ day of June, 2009.

Respectfully submitted,

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DAN S. FOLLUO OBA #11303  
RANDALL E. LONG OBA #22216  
Rhodes, Hieronymus, Jones, Tucker,  
and Gable  
P.O. Box 21100  
Tulsa, OK 74121-1100  
(918) 582-1173  
(918) 592-3390 (facsimile)  
Attorneys for Con-way Truckload,  
Inc. and Con-way, Inc.

#### **CERTIFICATE OF SERVICE**

The undersigned certifies that on June \_\_\_\_\_, 2009, a true and correct copy of the foregoing instrument was sent via e-mail and placed in the U.S. mail, postage prepaid to:

John L. Branum, OBA #20165  
1350 S.W. 89<sup>th</sup> Street  
Oklahoma City, OK 73159  
Attorney for Plaintiff

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DAN S. FOLLUO / RANDALL E. LONG